

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

FRED FOSTER d/b/a UNLEASHED PRODUCTIONS,

Plaintiff,

VS.

CIVIL CASE No: 2:07-cv-00472

**ROY JONES & THE BODY HEAD
BANGERZ d/b/a BODY HEAD
ENTERTAINMENT.**

ENTERTAINMENT.

Defendant.

)

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on July 12, 2007 at and was attended by:

Michael Guy Holton for plaintiff(s) Fred Foster/Unleashed Productions

Marvin H. Campbell for defendant(s) Roy Jones and the Body Head Bangerz.

2. Pre-Discovery Disclosures. The parties will exchange by August 30, 2007 the information required by Fed. R. Civ. P. 26(a)(1).

3. **Discovery Plan.** The parties jointly propose to the court the following discovery plan:

Discovery will be needed on the following subjects:

- (a) Contract(s) between parties;
- (b) Damages as alleged by Plaintiff;

Disclosure or discovery of electronically stored information should be handled as follows:

Electronically stored information shall be exchanged among the parties via

email of such information in “pdf” formatted folders, disc(s), and or by certified copy of printed version.

- (1) All discovery commenced in time to be completed by December 01, 2007.
- (2) Maximum of 40 (forty) interrogatories by each party to any other party.
- (3) Responses due 30 (thirty) days after service.
- (4) Maximum of 20 (twenty) requests for admission by each party to any other party.
- (5) Responses due 15 (fifteen) days after service.
- (6) Maximum of 5 (five) depositions by plaintiff(s) and 5 (five) by defendant(s).
- (7) Each deposition limited to maximum of 4 (four) hours unless extended by agreement of parties.
- (8) Reports from retained experts under Rule 26(a)(2) due:
from plaintiff(s) by September 15, 2007;
from defendant(s) by September 20, 2007.
- (9) Supplementations under Rule 26(e) due by January 30, 2008.

4. Other Items.

The parties do not request a conference with the court before entry of the scheduling order.

The parties request a pretrial conference in February 2008.

Plaintiff(s) should be allowed until December 01, 2007 to join additional parties and until December 20th, 2007 to amend the pleadings.

Defendant(s) should be allowed until December 01, 2007 to join additional

parties and until December 20th, 2007 to amend the pleadings.

All potentially dispositive motions should be filed by January 20th, 2008.

Settlement cannot be evaluated prior to December 01, 2007.

Final lists of witnesses and exhibits under Rule 26(a)(3) should be due

from plaintiff(s) by January 20th, 2008

from defendant(s) by January 25th, 2008.

Parties should have 10 (ten) days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

The case should be ready for trial by March 2007 and at this time is expected to take approximately 2 days.

RESPECTFULLY SUBMITTED this the 12th day of July, 2007.

____s/Michael Guy Holton____
Michael Guy Holton (HOL106)
Jennifer Mae Holton (DAV167)
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CERTIFICATE OF SERVICE

I do hereby certify that I have served a copy of the foregoing on the below listed counsel by filing same on the E-File Court Filing System for the United States District Court, Middle District of Alabama, Northern Division on this the 12th day of July, 2007.

Marvin H. Campbell, Esq.
P.O. Box 4979
Montgomery, Alabama 36103

/s Michael Guy Holton
OF COUNSEL
